

John W. Stephens, OSB No. 773583  
stephens@eslerstephens.com  
Michael J. Esler, OSB No. 710560  
esler@eslerstephens.com  
**ESLER, STEPHENS & BUCKLEY LLP**  
121 SW Morrison Street, Suite 700  
Portland, OR 97204-2012  
Telephone: (503) 223-1510  
Facsimile: (503) 294-3995

Randolph C. Foster, OSB No. 784340  
randy.foster@stoel.com  
Timothy W. Snider, OSB No. 034577  
timothy.snider@stoel.com  
Rachel C. Lee, OSB No. 102944  
rachel.lee@stoel.com  
**STOEL RIVES LLP**  
760 SW Ninth Avenue, Suite 3000  
Portland, OR 97205  
Telephone: (503) 224-3380  
Facsimile: (503) 220-2480

Attorneys for All Defendants

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
MEDFORD DIVISION

JEFF BOARDMAN, et al.,

Plaintiffs,

v.

PACIFIC SEAFOOD GROUP, et al.,

Defendants.

Case No.: 1:15-cv-00108-MC

**SUPPLEMENTAL  
MEMORANDUM IN SUPPORT  
OF MOTION FOR LEAVE TO  
FILE REPLY IN SUPPORT OF  
MOTION TO COMPEL  
COMPLIANCE WITH  
SUBPOENAS**

---

**SUPPLEMENTAL MEMORANDUM IN SUPPORT OF MOTION FOR LEAVE  
TO FILE REPLY IN SUPPORT OF MOTION TO COMPEL COMPLIANCE  
WITH SUBPOENAS**

Pacific Seafood filed its motion for leave to file a reply in support of its motion to compel compliance with subpoenas (Dkt. No. 189) on November 10, 2017. During the four months that Pacific Seafood's motion for leave to file a reply has been pending, the depositions of Respondents Richard Carroll and Edward Backus in January 2018 revealed that—contrary to Respondents' representations to Pacific Seafood and the Court—their production was *not* complete. Respondents made an additional production in March 2018, which Pacific Seafood has reason to believe *still* does not complete their production. In light of these developments, Pacific Seafood renews its motion for leave to file a reply. If the Court grants the motion for leave, Pacific Seafood intends to file a reply in the form attached hereto as Exhibit 1 and a supporting declaration.

DATED: March 13, 2018.

STOEL RIVES LLP

/s/ Timothy W. Snider

Randolph C. Foster, OSB No. 784340

Timothy W. Snider, OSB No. 034577

Rachel C. Lee, OSB No. 102944

and

John W. Stephens, OSB No. 773583

Michael J. Esler, OSB No. 710560

**ESLER, STEPHENS & BUCKLEY LLP**

121 SW Morrison Street, Suite 700

Portland, OR 97204-2012

Telephone: (503) 223-1510

Fax: (503) 294-3995

Attorneys for Defendants